

## United States Court

District of Oregon

Portland

United States of America,  
Plaintiff,

Case

NO. 3:17-CR-00400-HZ

-v-

Jason Paul Schaefer,  
Defendant.★ Defendant's Reply★  
Motion for "Daubert"  
hearing

Comes now, Defendant Pro-se Jason Schaefer seeking a Daubert hearing to test the veracity of the Scientific evidence the government intends to introduce at trial.

The evidence collected was subjected to testing methods which were flawed and not consistent with methodologies conducted which would produce an accurate result.

For example, the government employed the "Abum" test, also called a "First Defender" test, which tested positive for TATP. The Abum test, which on its face appears so final and so thoroughly conclusive, is actually only a preliminary test which is not at all conclusive or determinative and is not capable of producing an accurate determination.

The government claims it has employed a variety of tests, but most commonly employed types of analytical tests simply do not work with the substance Acetone Peroxide, or TATP. The substance has a particularly flimsy molecular profile which is subject to rapid degradation, sublimation, and, in the case of analytical tests which employ heat, the substance explodes before it can be analyzed.

Additionally, in this case, bomb technicians and Federal officers did not follow procedures which should have been followed when handling "Samples" collected from the defendant. They did not wear gloves, used a bomb robot, and placed multiple samples in unmarked, unverified bottles clustered together. The FBI Laboratories received these samples in a similar condition.

Evidence indicates that the types of tests and methods of handling samples in this case were haphazard and have led to the development of extremely prejudicial evidence which should never be presented to a jury.

The Defense would like 2 explosives experts to appear at Oral Arguments for this case, and respectfully requests they be flown in to meet with the defendant and educate him for the upcoming arguments and be allowed



to testify at oral Arguments to support  
this motion. These experts are Matthew Hefti, and  
Dr. Whitehurst.

Respectfully Submitted to the Courts this April  
18<sup>th</sup>, 2019.

Jason Schaefer.

A handwritten signature in blue ink, appearing to read 'Jason Schaefer', with a stylized, sweeping flourish at the end.